

EXHIBIT B



Todd & Weld LLP

Max D. Stern
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February 25, 2025

VIA EMAIL

Assistant United States Attorney Nadine Pellegrini
United States Attorney's Office
John J. Moakley Courthouse
1 Courthouse Way, Suite 9200
Boston, MA 02210

Re: United States of America v. Adam Bied, 24-cr-10171-FDS

Dear Nadine:

This letter contains the following further requests for discovery:

1. A bill of particulars setting forth the following:
 - a. For every action which the defendant or CC – 1 committed or agreed to commit as part of or in furtherance of the conspiracy alleged in Count One, please specify:
 - a. the species involved;
 - b. who was involved;
 - c. the manner and means; and
 - d. the date of the action.
 - b. For every action which the defendant or CC- 2 committed or agreed to commit as part of or in furtherance of the conspiracy alleged in Count One, please specify:
 - a. The species involved;
 - b. Who was involved;
 - c. The manner and means; and
 - d. The date of the action.
2. Copies of *prior* investigation reports which are specifically referenced in Report# : R001 and R006 of the Government's INV#2021501079 Agent Reports. Those reports include the following:
 - a. Report#: R001: INV# 2014302827, 2007402537, 2017981089 (2016) and INV#2014103823 (2015) *See*, pp. 2, 7. of 9.¹

¹ In reviewing a set of government' "Agent Reports", authored by James Dowd, Dr. Bied, "CC1" and "CC2" were investigated for similar acts in 2011-2014. *See*, "Report 1" (INV# 2021501079R001).



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- b. Report#: R006: The Investigative report relating to an alleged 2011 “import of a chimpanzee skull”.² *See*, p. 9 of 13.
3. Copies of reports, notes and outcomes of searches performed through Service Law Enforcement Management Information System (LEMIS). According to Report#: R006, R007, and R008 of INV #: 2021501079, LEMIS was used to determine both Dr. Bied, CCI, and CC2’s permit/ licensing status. Please provide the following:
 - a. LEMIS search/inquiry performed on Marh 7-8, 2021. *See*, Report #: R001 at 2 of 9
 - b. LEMIS search/inquiry relating to “chimpanzee skull from Cameroon in 2011”. *Id.* at 7 of 9
 - c. LEMIS inquiry revealing “BIED imported a hyena skull and a great white pelican skull from Belgium in 2016 (Service Declaration Control No. 2017981089). *Id.* at 7 of 9
 - d. LEMIS search relating to package (CL042339421ru) on March 29, 2021, between Dr. Bied and “NELSON (dba MONSIEUR FLEUR ARTICULATION), specifically a copy of “import/export license that was found to have been issued with Service on May 5, 2021, with an expiration of April 30, 2022. *See*, Report#: R007 at 3-4 of 10.
 - e. Any and all Service records of Dr. Bied’s wildlife declarations. *As referenced in*, Report#: R008 (INV #: 2021501079) at 7 of 18 (“ SA Dowd [...] knew from his investigation that the Service only had record of two wildlife declarations associated with Bied”).
 - f. Any other wildlife declaration associated with “CC1” and “CC2”.

Please note that we may make additional discovery requests after reviewing additional discovery that is produced. Please call if you have any questions regarding these requests.

Very truly yours,

Max D. Stern

² Report R006 states “ SA Dowd’s investigation revealed BIED had been briefly investigated by the Service for his unlawful import of a chimpanzee skull in 2011. This 2011 investigation focused on a Cameroon national found to be smuggling protected primate skulls out of Cameroon. During this investigation, a Yahoo Inc. email search warrant found communications between the Cameroon smuggler and BIED in which they discussed the purchase and sale of non-human primate skulls. These e-mail conversations resulted in BIED purchasing a chimpanzee skull from the Cameroon smuggler, which was subsequently shipped from Cameroon to BIED’s New York residence. At the time of this unlawful import, Chimpanzees were categorized as Endangered on the FWS’ Endangered Species List. BIED was neither contacted by law enforcement nor charged for this violation.”



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cc: Hannah Black, Esq.
Shayla Mombeleur, Esq.